GOOGLE LLC'S OBJECTIONS TO SPECIAL MASTER'S REPORT

Redacted Version of Document Sought to be Sealed

1	QUINN EMANUEL URQUHART & SULLIN	/AN, LLP
	Diane M. Doolittle (CA Bar No. 142046)	Andrew H. Schapiro (admitted pro hac vice)
2	dianedoolittle@quinnemanuel.com	andrewschapiro@quinnemanuel.com
3	Sara Jenkins (CA Bar No. 230097)	Teuta Fani (admitted pro hac vice)
اد	sarajenkins@quinnemanuel.com	teutafani@quinnemanuel.com
4	555 Twin Dolphin Drive, 5th Floor	191 N. Wacker Drive, Suite 2700
	Redwood Shores, CA 94065	Chicago, IL 60606
5	Telephone: (650) 801-5000	Telephone: (312) 705-7400
6	Facsimile: (650) 801-5100	Facsimile: (312) 705-7401
	Stephen A. Broome (CA Bar No. 314605)	Josef Ansorge (admitted pro hac vice)
7	stephenbroome@quinnemanuel.com	josefansorge@quinnemanuel.com
8	Viola Trebicka (CA Bar No. 269526)	Xi ("Tracy") Gao (CA Bar No. 326266)
	violatrebicka@quinnemanuel.com	tracygao@quinnemanuel.com
9	Crystal Nix-Hines (Bar No. 326971)	Carl Spilly (admitted <i>pro hac vice</i>)
	crystalnixhines@quinnemanuel.com	carlspilly@quinnemanuel.com
10	Alyssa G. Olson (CA Bar No. 305705)	1300 I Street NW, Suite 900
11	alyolson@quinnemanuel.com	Washington D.C., 20005
11	865 S. Figueroa Street, 10th Floor	Telephone: (202) 538-8000
12	Los Angeles, CA 90017	Facsimile: (202) 538-8100
	Telephone: (213) 443-3000	140000000000000000000000000000000000000
13	Facsimile: (213) 443-3100	
14		
	Jomaire Crawford (admitted <i>pro hac vice</i>)	Jonathan Tse (CA Bar No. 305468)
15	jomairecrawford@quinnemanuel.com	jonathantse@quinnemanuel.com
1,	51 Madison Avenue, 22nd Floor	50 California Street, 22nd Floor
16	New York, NY 10010	San Francisco, CA 94111
17	Telephone: (212) 849-7000	Telephone: (415) 875-6600
	Facsimile: (212) 849-7100	Facsimile: (415) 875-6700
18	Counsel for Defendant Google LLC	
19	LIMITED STATES	DISTRICT COURT
20	OMILD STATES	DISTRICT COURT
۷	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
21		La vi tao ookki van avii
	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	Case No. 4:20-cv-03664-YGR-SVK
22	CASTILLO, and MONIQUE TRUJILLO,	GOOGLELLC'S OBJECTIONS TO
23	individually and on behalf of themselves and	SPECIAL MASTER'S REPORT AND
	all others similarly situated,	RECOMMENDATION ON REFERRED
24	Disintiffs	DISCOVERY ISSUES (PRESERVATION
ا ء د	Plaintiffs,	PLAN)
25	VS.	
26		Referral: Hon. Susan van Keulen, USMJ
	GOOGLE LLC,	
27	Defendant.	
28	Derengant.	
/.O I		•

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 3 of 17

1	Pursuant to the Court's April 4, 2022 Order (Dkt. 526), Google hereby provides its
2	objections to the Special Master's Report and Recommendation on Referred Discovery Issue
3	(Preservation Plan). Dkt. 524.
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
$_{28} $	

19

20

21

Google previously proposed to preserve a daily sample of 1,000 Display Ads events associated with 1,000 different randomly selected UIDs scoped to activity in the United States. The Special Master's recommendation that Google "preserve all records for 10,000 randomly selected US based IDs ... for each day for which there is data" sweeps in significantly more data and requires more storage. However, Google will not object if it will provide final resolution to the preservation issue.

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 5 of 17

	3	Display Ads Logs		No objection. Google agrees to preserve data from
1	4	Display Ads Logs	7	No objection. Google agrees to preserve data from
2	5	Display	8	No objection. Google agrees to preserve data from
3	6	Ads Logs Display		No objection. Google agrees to preserve data from
4	7	Logs	1	No objection Construence to manage data from
5	/	Display Logs	4	No objection. Google agrees to preserve data from Google confirms this data source is a duplicate of row 4.
6	8	Display Logs	5	No objection. Google agrees to preserve data from Google confirms this data source is a duplicate of row 5.
7 8	9	Display Logs		No objection. Google agrees to preserve data from
0	10	GAIA		Google objects to preserving data from this log
9		Logs).
10				The source is a personal log (or P-log) to which data is
11				only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because
12				Plaintiffs' class definition is expressly limited to signed
13				out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
920.000	11	GAIA Logs		Google objects to preserving data from this log
14		Logs		<i>)</i> -∞
15				The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
16				Data in P-logs is outside of the case scope because
17				Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
18	10	CATA		192.
19	12	GAIA Logs		Google objects to preserving data from this log (
900000				59
20				

4

21

22

1 2 3				The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
4	13	GAIA Logs	25	Google objects to preserving data from this log
5				The source is a personal log (or P-log) pertaining to
6				Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining
7				to Gmail Ads is outside of the case scope because: (1) Plaintiffs' class definition is expressly limited to signed
8				out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
9				192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third
10				amended complaint, Plaintiffs' purported class was specifically limited to individuals "who accessed a non-
11				Google website containing Google Analytics or Ad Manager." Dkt. 136-1 (SAC), ¶ 192.
12	14	GAIA Logs	26	Google objects to preserving data from this log (
13				The source is a personal log (or P-log) to which data is
14				only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because
15				Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
16				192.
17	15	GAIA Logs	27	Google objects to preserving data from this log (
18				The source is a personal log (or P-log) to which data is
19				only written when a user is signed in to a Google Account.
20				

21

22

					Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed
1					out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
2	16	GAIA	28	This Date seems	192.
2	16	Logs	28	This Data source name may have been	Google objects to preserving data from this log (
3				truncated. If there are	
4				more than 3 data sources with this "root", please	The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
5				advise Plaintiffs and they	Data in P-logs is outside of the case scope because
-				may select up to three of these data source for	Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
0				preservation in the same	192.
7				manner as the other data sources identified herein	
8	17	GAIA	29		Google objects to preserving data from this log
9		Logs).
					The source is a personal log (or P-log) to which data is
10					only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because
11					Plaintiffs' class definition is expressly limited to signed
12					out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
13	18	GAIA	30		Google objects to preserving data from this log (
NUNCTURE OF THE PERSON		Logs			e).
14					The source is a personal log (or P-log) pertaining to
15					Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining
16					to Gmail Ads is outside of the case scope because: (1)
17					Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
18					192); and (2) up until less than a month ago when the Court granted Plaintiffs' motion for leave to file a third
N.Japana	ď.				amended complaint, Plaintiffs' purported class was
19					
20					

21

22

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 8 of 17

68			specifically limited to individuals "who accessed a non-
			Google website containing Google Analytics or Ad
۸.			Manager." Dkt. 136-1 (SAC), ¶ 192.
19	GAIA	31	Google objects to preserving data from this log
	Logs		
).
			The source is a personal log (or P-log) to which data is
			only written when a user is signed in to a Google Account.
			Data in P-logs is outside of the case scope because
			Plaintiffs' class definition is expressly limited to signed
			out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
20	CATA	 22	
20	GAIA	32	Google objects to preserving data from this log (
	Logs		<i>)</i> .
			The source is a personal log (or P-log) to which data is
			only written when a user is signed in to a Google Account.
			Data in P-logs is outside of the case scope because
			Plaintiffs' class definition is expressly limited to signed
			out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
			192.
21	GAIA	33	Google objects to preserving data from this log
	Logs		
			The source is a personal log (or P-log) to which data is
			only written when a user is signed in to a Google Account.
			Data in P-logs is outside of the case scope because
			Plaintiffs' class definition is expressly limited to signed
			out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
			192.
22	GAIA-		Google confirms this data source is a duplicate of row 10.
	Keyed		Google objects to preserving data from this log.
	Logs		The source is a personal less (on D. less) to which details
			The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
			Data in P-logs is outside of the case scope because
	Į.	1	Data in P-logs is outside of the case scope because
1			,

7

21

22

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 9 of 17

- 11						
1					ou	laintiffs' class definition is expressly limited to signed at users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
2	23	GAIA- Keyed Logs				oogle confirms this data source is a duplicate of row 11. oogle objects to preserving data from this log.
3						he source is a personal log (or P-log) to which data is nly written when a user is signed in to a Google Account.
4					Da	ata in P-logs is outside of the case scope because laintiffs' class definition is expressly limited to signed
5					ou 19	ut users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 92.
7	24	GAIA- Keyed Logs		12		oogle confirms this data source is a duplicate of row 12. oogle objects to preserving data from this log.
8		Logs				he source is a personal log (or P-log) to which data is nly written when a user is signed in to a Google Account.
9					Da	ata in P-logs is outside of the case scope because
10					ou	laintiffs' class definition is expressly limited to signed at users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
11	25	GAIA- Keyed		13		oogle confirms this data source is a duplicate of row 13. oogle objects to preserving data from this log.
12		Logs	. · · · · · · · · · · · · · · · · · · ·			
13					Gı	he source is a personal log (or P-log) pertaining to mail; data to this log is written only when a user is
14						gned in to a Google Account. Data in P-logs pertaining Gmail Ads is outside of the case scope because: (1)
15					20-444	laintiffs' class definition is expressly limited to signed it users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
16					19	(2); and (2) up until less than a month ago when the ourt granted Plaintiffs' motion for leave to file a third
17					an	nended complaint, Plaintiffs' purported class was
18					Go	pecifically limited to individuals "who accessed a non- oogle website containing Google Analytics or Ad
19					M	Ianager." Dkt. 136-1 (SAC), ¶ 192.
- 11						

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 10 of 17

26	GAIA- Keved		14		Google confirms this data source is a duplicate of row 14. Google objects to preserving data from this log.
	Logs				
					The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
					Data in P-logs is outside of the case scope because
					Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
					192.
27	Keyed		15		Google confirms this data source is a duplicate of row 15. Google objects to preserving data from this log.
	Logs				The source is a personal log (or P-log) to which data is
					only written when a user is signed in to a Google Account.
					Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed
					out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
28	GAIA- Keved		16		Google confirms this data source is a duplicate of row 16. Google objects to preserving data from this log.
	Logs				
					The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
					Data in P-logs is outside of the case scope because
					Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
20	CATA				192.
29	Keyed		17		Google confirms this data source is a duplicate of row 17. Google objects to preserving data from this log.
	Logs				The service is a personal log (or D log) to which data is
					The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
					Data in P-logs is outside of the case scope because
					Plaintiffs' class definition is expressly limited to signed
					out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
	27	27 GAIA- Keyed Logs 28 GAIA- Keyed Logs 29 GAIA- Keyed	Keyed Logs 27 GAIA-Keyed Logs 28 GAIA-Keyed Logs	Keyed Logs 27 GAIA-Keyed Logs 28 GAIA-Keyed Logs 16 29 GAIA-Keyed 17	Keyed Logs 27 GAIA-Keyed Logs 28 GAIA-Keyed Logs 16 29 GAIA-Keyed Indianate and the second secon

	30	GAIA- Keyed	18	Google confirms this data source is a duplicate of row 18. Google objects to preserving data from this log.
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$		Logs		The source is a personal log (or P-log) pertaining to
2				Gmail; data to this log is written only when a user is signed in to a Google Account. Data in P-logs pertaining
3				to Gmail Ads is outside of the case scope because: (1)
4				Plaintiffs' class definition is expressly limited to signed out users (Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
5				192); and (2) up until less than a month ago when the
6				Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs' purported class was
_				specifically limited to individuals "who accessed a non- Google website containing Google Analytics or Ad
7	d.	2		Manager." Dkt. 136-1 (SAC), ¶ 192.
8	31	GAIA- Keyed	19	Google confirms this data source is a duplicate of row 19. Google objects to preserving data from this log.
9		Logs		
$0 \parallel$				The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
$_{1}\ $				Data in P-logs is outside of the case scope because
200000				Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
2				192.
3	32	GAIA- Keyed	20	Google confirms this data source is a duplicate of row 20. Google objects to preserving data from this log.
4		Logs		
5				The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account.
				Data in P-logs is outside of the case scope because
6				Plaintiffs' class definition is expressly limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶
7	33	GAIA-	 21	192. Google confirms this data source is a duplicate of row 21.
8	33	Keyed	21	Google objects to preserving data from this log.
9		Logs		
150 E				

ll l				
1				The source is a personal log (or P-log) to which data is only written when a user is signed in to a Google Account. Data in P-logs is outside of the case scope because Plaintiffs' class definition is expressly limited to signed
2				out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
3	34	Other Ads Logs		No objection. Google agrees to preserve data from
4	35	Other Ads Logs		No objection. Google agrees to preserve data from
5	36	Other Ads Logs		No objection. Google agrees to preserve data from
6	37	Other Ads Logs		No objection.
8	38	Search Ads Logs		No objection.
9	39	Search Ads Logs		No objection.
10	40	Search		No objection. Google agrees to preserve data from
11		Logs		Google confirms this data source is a duplicate of row 37.
12	41	Search Logs		No objection. Google agrees to preserve data from Google confirms this data source is a duplicate of row 38.
13	42	Search		Google agrees to preserve data from
14		Logs		
15				This truncated log name ("This truncated log name") appears to be
16				taken from Plaintiffs' March 16, 2022 submission to the
17				Special Master titled "2022-03-16 Top 10 Fields BSF." In this submission Plaintiffs selected fields for which Google
18				was to provide values from 23 logs, including
19	10	e e	L	The full log name that Google
20				

21

22

Case 4:20-cv-03664-YGR Document 543-3 Filed 04/15/22 Page 13 of 17

	38				disclosed on March 1, 2022 as one of the logs
					is:
1					However, Google clarified on March 4, 2022 that the
2					correct name for this log is
2					(not
3	43		* 		No objection.
4	44				Google objects to preserving data from this keyspace.
5					The keyspace is only written when a user is signed in to a Google Account. Data in this GAIA-keyed keyspace is outside of the case scope because Plaintiffs' class
0					definition is expressly limited to signed out users. Dkt.
7					136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
	45				Google objects to preserving data from this keyspace.
8					The keyspace is only written when a user is signed in to a
9					Google Account. Data in this GAIA-keyed keyspace is
18. An					outside of the case scope because Plaintiffs' class
10					definition is expressly limited to signed out users. Dkt.
11					136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
5.05	46	Unknown			No objection. Google agrees to preserve the
12					dashboard data, which is based on
13					and boolean fields.
	47				Google objects to preserving data from this log source for
14					this matter.
15					This log writes information when a user is signed into the
16					Chrome browser and into a Google Account in the content
10					area, and is used to debug production problems and
17					compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this matter.
18					Data in this data source is outside of the case scope
10					because Plaintiffs' class definition is expressly limited to
19					
20					
21					
22	91			12	Case No. 4:20-cv-03664-YGR-SVK
	***				GOOGLE'S OBJECTIONS TO SPECIAL MASTER REPORT
23					

					signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
1	48				Google objects to preserving data from this log source for this matter.
2			10 po		lans matter.
3					This log writes information when a user is signed into the Chrome browser and into a Google Account in the content
4					area, and is used to debug production problems and
5					compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this matter.
1000					Data in this data source is outside of the case scope because Plaintiffs' class definition is expressly limited to
6					signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
,	49				Google objects to preserving data from this log source for this matter.
8					tins matter.
9					This log writes information when a user is signed into the Chrome browser and into a Google Account in the content
10					area, and is used to debug production problems and
11					compute aggregated product metrics. Because this log relates to Chrome sync, it is irrelevant for this
12					matter. Data in this data source is outside of the case scope because Plaintiffs' class definition is expressly
13					limited to signed out users. Dkt. 136-1 (SAC), ¶ 192; Dkt. 395-2 (TAC), ¶ 192.
14	50	Unknown	UMA Logs		No objection.
15	51				Google objects to preserving data from this keyspace for this matter.
14,000,00					is not one of the relevant data sources
16					identified for this matter, because up until less than a
17					month ago when the Court granted Plaintiffs' motion for leave to file a third amended complaint, Plaintiffs'
18					purported class was specifically limited to individuals "who accessed a non-Google website containing Google
19					who accessed a non-Google website containing Google
20					
21					
- 11				1.2	AND CONTRACT TO SERVICE TO SERVICE TO SERVICE TO SERVICE THE SERVICE TO SERVI

22

1 2 3 4 5 6	52	Unknown	Analytics or Ad Manager." SAC, Dkt. 136-1 ¶192. does not store data generated when users visit a third-party website that uses Google Analytics or Ad Manager. Additionally, the Court ordered that "given plaintiffs" representations that amendment would not impact discovery in this case, plaintiffs may not rely on their newly revised class definitions to: Seek additional or supplemental document productions; Request that Google supplement any of its discovery responses." TAC, Dkt. 504 at 2. No objection. However, as of March 11, 2020, this log no longer collects data. No objection.
7	54	Unknown	No objection.
8	55	Unknown	No objection. Google confirms this data source is a duplicate of row 35.
9	56	Unknown	No objection.
10	57	Unknown	No objection.
11			
12	58	Unknown	No objection.
13			
14	59	Unknown	No objection.
15	60	Unknown	No objection.
13			

1	DATED A 3115 2022	
2	DATED: April 15, 2022	QUINN EMANUEL URQUHART & SULLIVAN, LLP
3		
4		By/s/ Andrew H. Schapiro
5		Andrew H. Schapiro
6		Andrew H. Schapiro (admitted pro hac vice)
7		andrewschapiro@quinnemanuel.com Teuta Fani (admitted <i>pro hac vice</i>)
8		teutafani@quinnemanuel.com 191 N. Wacker Drive, Suite 2700
9		Chicago, IL 60606
		Telephone: (312) 705-7400
10		Facsimile: (312) 705-7401
11		Diane M. Doolittle (CA Bar No. 142046)
12		dianedoolittle@quinnemanuel.com Sara Jenkins (CA Bar No. 230097)
13		sarajenkins@quinnemanuel.com
		555 Twin Dolphin Drive, 5th Floor
14		Redwood Shores, CA 94065 Telephone: (650) 801-5000
15		Facsimile: (650) 801-5100
16		Stephen A. Broome (CA Bar No. 314605)
17		stephenbroome@quinnemanuel.com
18		Viola Trebicka (CA Bar No. 269526) violatrebicka@quinnemanuel.com
		Crystal Nix-Hines (Bar No. 326971)
19		crystalnixhines@quinnemanuel.com
20		Alyssa G. Olson (CA Bar No. 305705) alyolson@quinnemanuel.com
21		865 S. Figueroa Street, 10th Floor
22		Los Angeles, CA 90017 Telephone: (213) 443-3000
23		Facsimile: (213) 443-3100
24		Jomaire A. Crawford (admitted pro hac vice)
25		jomairecrawford@quinnemanuel.com 51 Madison Avenue, 22nd Floor
26		New York, NY 10010
		Telephone: (212) 849-7000 Facsimile: (212) 849-7100
27		
28		

1	
2	Josef Ansorge (admitted <i>pro hac vice</i>)
3	josefansorge@quinnemanuel.com Xi ("Tracy") Gao (CA Bar No. 326266)
4	tracygao@quinnemanuel.com Carl Spilly (admitted <i>pro hac vice</i>)
5	carlspilly@quinnemanuel.com
6	1300 I Street NW, Suite 900 Washington D.C., 20005
7	Telephone: (202) 538-8000 Facsimile: (202) 538-8100
8	Jonathan Tse (CA Bar No. 305468)
9	jonathantse@quinnemanuel.com
10	50 California Street, 22nd Floor San Francisco, CA 94111
11	Telephone: (415) 875-6600 Facsimile: (415) 875-6700
12	
13	Attorneys for Defendant Google LLC
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
20	